

LINH T. VU, OSB #004164
Senior Deputy City Attorney
linh.vu@portlandoregon.gov
Portland City Attorney's Office
1221 SW 4th Ave., Rm. 430
Portland, OR 97204
Telephone: (503) 823-4047
Facsimile: (503) 823-3089
Of Attorneys for City of Portland

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

**HEATHER-LYNNE
VAN WILDE,**

3:22-cv-01244-AR

PLAINTIFF,

DECLARATION OF LINH T. VU

v.

**(In Support of Defendant's Motion for
Extension of Time to File Appearance)**

**CITY OF PORTLAND, PORTLAND
POLICE BUREAU OFFICER
JOHN DOE**

DEFENDANT.

I, Linh T. Vu, being first duly sworn, do depose and say:

1. I am the attorney representing City of Portland in the above-entitled matter and I make this declaration in support of defendant's request for an extension of time in which to file an initial appearance.

2. Plaintiff Heather-Lynne Van Wilde filed this case in the United States District Court for the District of Oregon on August 24, 2022.

3. Defendant City of Portland was served with the Summons and Complaint on September 22, 2022.

4. Defendant City of Portland's response to plaintiff's Complaint is due October 13, 2022. In order to conduct a background investigation and prepare and file a meaningful response

to plaintiff's Complaint, defendant City of Portland requests a 30-day extension of time, up to and including November 14, 2022 in which to file a first appearance.

5. Plaintiff's attorneys, Jane L. Moisan, Juan C. Chavez, Franz Bruggemeier and Jonny Gersten, have no objection to this request for an extension of time.

6. This motion is presented in good faith and not for reasons of delay.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: October 12, 2022



Linh T. Vu